

EXHIBIT 2

1
2 UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT OF NEW YORK

4 - - - - -x

5 E. JEAN CARROLL,

6 Plaintiff,

7 -against-

8 DONALD J. TRUMP, in his personal capacity,
9 Defendant.

10 - - - - -x

11
12 *** CONFIDENTIAL ***

13
14 Remote deposition of CAROL MARTIN, taken
15 pursuant to Notice, was held via videoconference,
16 commencing October 18, 2022, at 10:01 a.m., on the
17 above date, before Amanda McCredo, a Court Reporter
18 and Notary Public in the State of New York.
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2 BY MR. SWIFT:

3 Q You can answer, Ms. Martin.

4 A It was about personal issues. We weren't
5 working together.

6 Q Did Ms. Carroll ever contact you to discuss
7 any instances where she alleged she was sexually
8 assaulted?

9 MS. CROWLEY: Objection to form.

10 Ever? What's the time period?

11 MR. SWIFT: Yes, ever.

12 A I'm sorry, can you repeat?

13 BY MR. SWIFT:

14 Q Sure.

15 Did Ms. Carroll ever contact you at any
16 time to discuss whether she was sexually assaulted?

17 MR. BIALE: Objection to form.

18 Can you clarify what you mean by "contact
19 you"?

20 MR. SWIFT: I don't know how to -- how else
21 to phrase that question.

22 BY MR. SWIFT:

23 Q Has she -- did she ever --

24 MS. CROWLEY: Are you trying to ask did
25 Ms. Carroll ever tell Ms. Martin that she had

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2 been sexually assaulted?

3 MR. SWIFT: Yes, I guess that's a better
4 way of phrasing it. Let me make it clear for
5 the record.

6 BY MR. SWIFT:

7 Q Ms. Martin, did Ms. Carroll ever tell you
8 that she was sexually assaulted?

9 A Yes.

10 Q Did she tell you on how many occasions she
11 was sexually assaulted?

12 A Only one time. That de-minimized it. Only
13 one time.

14 Q Did she provide a name of the person that
15 she believed sexually assaulted her?

16 A Yes, she did.

17 Q Who was that person?

18 A Donald Trump.

19 Q Do you recall the specific date of the
20 conversation that Ms. Carroll told you -- withdrawn.

21 Was there a specific date that Ms. Carroll
22 told you that she believed she was sexually
23 assaulted by Donald Trump?

24 MR. BIALE: Objection to form.

25 MS. CROWLEY: Are you asking her for the

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2 And she said -- she went ahead to explain
3 the events.

4 Q Did she go over the events at that point?

5 A Yes. Yes, she did.

6 Q What exactly -- can you describe in detail
7 the events that Ms. Carroll explained to you at that
8 point?

9 A Conversation went for a while. But
10 basically she said that Mr. Trump had assaulted her
11 at Bergdorf's. And needless to say, it was shocking
12 to hear. My first words to her were was she okay.

13 Q Do you recall what Ms. Carroll's general
14 demeanor was when she told you this story in the
15 kitchen of your house?

16 A She was, I'll call it, as shocked as I was,
17 as she explained.

18 Q And how long, if you recall, did this
19 conversation in your kitchen take place?

20 A Hard to say. Maybe half hour.

21 Q What happened after -- withdrawn.

22 Did you believe Ms. Carroll's account of
23 the purported incident at the time she shared it
24 with you?

25 A Yes, I did.

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2 Q Did you have any reason to doubt
3 Ms. Carroll at that time?

4 A I did not.

5 Q At the conclusion of this half hour
6 meeting, approximately, did you advise Ms. Carroll
7 as to what your opinion -- withdrawn.

8 At the conclusion of this half hour
9 meeting, did you advise Ms. Carroll on how you think
10 she should proceed at that point?

11 A I did.

12 Q What was your advice?

13 A Because she had said she felt physically
14 okay that day and she wasn't sure what to do, I
15 advised her not to do anything.

16 Q Was there any other reason you advised her
17 not to do anything at that point?

18 A Yes.

19 MR. BIALE: Objection to form.

20 BY MR. SWIFT:

21 Q Go ahead. Please answer, Ms. Martin.

22 A It was my belief that -- and I said to
23 her -- that Mr. Trump had many lawyers and he would
24 bury her from her allegation.

25 Q When you had this conversation in the

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2 kitchen, did Ms. Carroll tell you when this alleged
3 sexual assault occurred?

4 A My recollection was it was a few days
5 before the conversation. Maybe a day or two. I'm
6 not sure.

7 Q I know you testified that you advised
8 Ms. Carroll not to report this or go to the police;
9 is that correct?

10 MR. BIALE: Objection; misstates the
11 testimony.

12 BY MR. SWIFT:

13 Q Let me rephrase then.

14 Did you ever consider reporting this
15 alleged incident to the police yourself?

16 A I did not.

17 Q Was there a reason you did not?

18 A Primarily because she had already been
19 advised to do that by another friend to whom she had
20 spoken about it. She had declined.

21 And on the day we spoke, she seemed not
22 inclined to want to go to the police. I respected
23 her opinion. I respected her decision.

24 Q Who is this other friend that you're
25 referring to?

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2 information about Ms. Carroll's account of the
3 alleged sexual assault by Mr. Trump?

4 A It did have details, yes.

5 Q I said before "approximately" 2019.

6 Was it your recollection that the book came
7 out in approximately July 2019?

8 A I think that's right.

9 Q Do you know approximately when you -- you,
10 yourself, actually read the book?

11 A On or about the publication date, there
12 were -- I think it was around then.

13 Q Do you think that Ms. Carroll's
14 recollection of the incident described in the book,
15 did that align with your memory of what she told you
16 back in the mid-1990s?

17 MR. BIALE: Objection to form.

18 You can answer the question.

19 A Yes, it did.

20 BY MR. SWIFT:

21 Q Ms. Martin, did you have any involvement or
22 input in the book published by Ms. Carroll entitled
23 What Do We Need Men for?

24 MR. BIALE: Objection to form.

25 Can you clarify what you mean by that?